

January 25, 1996

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M92613 AND M92614)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 108 to Facility Operating License No. NPF-39 and Amendment No. 71 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated June 20, 1995.

These amendments revise TS Surveillance Requirements 4.6.1.2.a, 4.6.1.2.b, and 4.6.1.2.e, to reference 10 CFR Part 50, Appendix J, for the 1) Type A (Integrated Leakage Rate Test), and 2) Drywell-to-Suppression Chamber (bypass) leakage tests instead of providing explicit testing requirements in the TS.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/s/

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/353

- Enclosures: 1. Amendment No. 108 to License No. NPF-39
Amendment No. 71 to License No. NPF-85
- 2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

Docket File	MO'Brien	CGrimes
PUBLIC	FRinaldi	SDembek
PDI-2 Reading	OGC	ACRS
SVarga	GHill(4)	CBerlinger
JStolz	JPasciak, RGN-I	

RL for

OFFICE	PDI-2/LA	PDI-2/PM	PDI-2/PPM	BC/SCSB	OGC	PDI-2/D
NAME	MO'Brien	SDembek:rb	FRinaldi	CBerlinger	EHoller	JStolz
DATE	1/95	12/13/95	12/14/95	12/21/95 <i>HW</i>	12/24/95	1/22/96

OFFICIAL RECORD COPY
DOCUMENT NAME: LI92613.AMD

9602050046 960125
PDR ADOCK 05000352
P PDR

NRC FILE CENTER COPY

JStolz



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 25, 1996

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M92613 AND M92614)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 108 to Facility Operating License No. NPF-39 and Amendment No. 71 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TS) in response to your application dated June 20, 1995.

These amendments revise TS Surveillance Requirements 4.6.1.2.a, 4.6.1.2.b, and 4.6.1.2.e, to reference 10 CFR Part 50, Appendix J, for the 1) Type A (Integrated Leakage Rate Test), and 2) Drywell-to-Suppression Chamber (bypass) leakage tests instead of providing explicit testing requirements in the TS.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Frank Rinaldi".

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/353

Enclosures: 1. Amendment No. 108 to
License No. NPF-39
Amendment No. 71 to
License No. NPF-85
2. Safety Evaluation

cc w/encs: See next page

Mr. George A. Hunger, Jr.
PECO Energy Company

Limerick Generating Station,
Units 1 & 2

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
PECO Energy Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Rich R. Janati, Chief
Division of Nuclear Safety
PA Dept. of Environmental Resources
P. O. Box 8469
Harrisburg, Pennsylvania 17105-8469

Mr. David P. Helker, MC 62A-1
Manager-Limerick Licensing
PECO Energy Company
965 Chesterbrook Boulevard
Wayne, Pennsylvania 19087-5691

Mr. Michael P. Gallagher
Director - Site Engineering
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Walter G. McFarland, Vice President
Limerick Generating Station
Post Office Box A
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner
Manager-Experience Assessment
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Robert Boyce
Plant Manager
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Library
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. Ludwig E. Thibault
Senior Manager - Operations
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Neil S. Perry
Senior Resident Inspector
US Nuclear Regulatory Commission
P. O. Box 596
Pottstown, Pennsylvania 19464

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

Mr. Craig L. Adams
Director - Site Support Services
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Chairman
Board of Supervisors
of Limerick Township
646 West Ridge Pike
Linfield, PA 19468



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 108
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated June 20, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

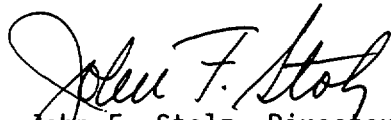
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 108, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: January 25, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 108

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change.

Remove

3/4 6-3

3/4 6-14

Insert

3/4 6-3

3/4 6-14

CONTAINMENT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

- b. The combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves* and valves which are hydrostatically tested per Table 3.6.3-1, subject to Type B and C tests to less than or equal to $0.60 L_a$, and
- c. The leakage rate to ≤ 11.5 scf per hour for any main steam isolation valve that exceeds 100 scf per hour, and restore the combined maximum pathway leakage to ≤ 200 scf per hour, and
- d. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves,

prior to increasing the reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI 45.4-1972 and BN-TOP-1 and verifying the result by the Mass Point Methodology described in ANSI N56.8-1981:

- a. Type A Overall Integrated Containment Leakage Rate tests shall be conducted at P_a , in accordance with 10CFR50, Appendix J, as modified by approved exemptions.
- b. If any periodic Type A test fails, or if two consecutive Type A tests fail, a Type A test shall be performed in accordance with 10CFR50, Appendix J, as modified by approved exemptions.
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
 1. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within $0.25L_a$. The formula to be used is: $[L_o + L_{am} - 0.25 L_a] \leq L_c \leq [L_o + L_{am} + 0.25 L_a]$ where L_c = supplemental test result; L_o = superimposed leakage; L_{am} = measured Type A leakage.
 2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.
 3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be between $0.75 L_a$ and $1.25 L_a$.

* Exemption to Appendix "J" to 10 CFR Part 50.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. By verifying at least 8 suppression pool water temperature indicators in at least 8 locations, OPERABLE by performance of a:
1. CHANNEL CHECK at least once per 24 hours.
 2. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
 3. CHANNEL CALIBRATION at least once per 24 months,

with the temperature alarm setpoint for:

1. High water temperature:
 - a) First setpoint $\leq 95^{\circ}\text{F}$
 - b) Second setpoint $\leq 105^{\circ}\text{F}$
 - c) Third setpoint $\leq 110^{\circ}\text{F}$
 - d) Fourth setpoint $\leq 120^{\circ}\text{F}$
- d. By verifying at least two suppression chamber water level indicators OPERABLE by performance of a:
1. CHANNEL CHECK at least once per 24 hours,
 2. CHANNEL FUNCTIONAL TEST at least once per 92 days, and
 3. CHANNEL CALIBRATION at least once per 24* months,

with the water level alarm setpoint for high water level $\leq 24'1-1/2''$

- e. Drywell-to-suppression chamber bypass leak tests shall be conducted to coincide with the Type A test (in accordance with 10CFR50, Appendix J, as modified by approved exemptions) at an initial differential pressure of 4 psi and verifying that the A/\sqrt{k} calculated from the measured leakage is within the specified limit. If any drywell-to-suppression chamber bypass leak test fails to meet the specified limit, the test schedule for subsequent tests shall be reviewed and approved by the Commission. If two consecutive tests fail to meet the specified limit, a test shall be performed at least every 24 months until two consecutive tests meet the specified limit, at which time the test schedule may be resumed.
- f. By conducting a leakage test on the drywell-to-suppression chamber vacuum breakers at a differential pressure of at least 4.0 psi and verifying that the total leakage area A/\sqrt{k} contributed by all vacuum breakers is less than or equal to 24% of the specified limit and the leakage area for an individual set of vacuum breakers is less than or equal to 12% of the specified limit. The vacuum breaker leakage test shall be conducted during each refueling outage for which the drywell-to-suppression chamber bypass leak test in Specification 4.6.2.1.e is not conducted.

* The CHANNEL CALIBRATION for level transmitters LT-55-1N062B, -1N062F shall be performed at least once per 18 months.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 71
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated June 20, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 71, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: January 25, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 71

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change.

Remove

3/4 6-3

3/4 6-14

Insert

3/4 6-3

3/4 6-14

CONTAINMENT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

- b. The combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves* and valves which are hydrostatically tested per Table 3.6.3-1, subject to Type B and C tests to less than or equal to $0.60 L_a$, and
- c. The leakage rate to ≤ 11.5 scf per hour for any main steam isolation valve that exceeds 100 scf per hour, and restore the combined maximum pathway leakage to ≤ 200 scf per hour, and
- d. The combined leakage rate for all containment isolation valves in hydrostatically tested lines which penetrate the primary containment to less than or equal to 1 gpm times the total number of such valves,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI 45.4-1972 and BN-TOP-1 and verifying the result by the Mass Point Methodology described in ANSI N56.8-1981:

- a. Type A Overall Integrated Containment Leakage Rate tests shall be conducted at P_a , in accordance with 10CFR50, Appendix J, as modified by approved exemptions.
- b. If any periodic Type A test fails, or if two consecutive Type A tests fail, a Type A test shall be performed in accordance with 10CFR50, Appendix J, as modified by approved exemptions.
- c. The accuracy of each Type A test shall be verified by a supplemental test which:
 1. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within $0.25 L_a$. The formula to be used is: $[L_0 + L_{am} - 0.25 L_a] \leq L_c \leq [L_0 + L_{am} + 0.25 L_a]$ where L_c = supplemental test result; L_0 = superimposed leakage; L_{am} = measured Type A leakage.
 2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.
 3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be between $0.75 L_a$ and $1.25 L_a$.

*Exemption to Appendix "J" to 10 CFR Part 50.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. By verifying at least 8 suppression pool water temperature indicators in at least 8 locations, OPERABLE by performance of a:
1. CHANNEL CHECK at least once per 24 hours.
 2. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
 3. CHANNEL CALIBRATION at least once per 24 months,

with the temperature alarm setpoint for:

1. High water temperature:
 - a) First setpoint $\leq 95^{\circ}\text{F}$
 - b) Second setpoint $\leq 105^{\circ}\text{F}$
 - c) Third setpoint $\leq 110^{\circ}\text{F}$
 - d) Fourth setpoint $\leq 120^{\circ}\text{F}$
- d. By verifying at least two suppression chamber water level indicators OPERABLE by performance of a:
1. CHANNEL CHECK at least once per 24 hours,
 2. CHANNEL FUNCTIONAL TEST at least once per 92 days, and
 3. CHANNEL CALIBRATION at least once per 24* months,

with the water level alarm setpoint for high water level $\leq 24'1\text{-}1/2''$

- e. Drywell-to-suppression chamber bypass leak tests shall be conducted to coincide with the Type A test (in accordance with 10CFR50, Appendix J, as modified by approved exemptions) at an initial differential pressure of 4 psi and verifying that the A/\sqrt{k} calculation from the measured leakage is within the specified limit. If any drywell-to-suppression chamber bypass leak test fails to meet the specified limit, the test schedule for subsequent tests shall be reviewed and approved by the Commission. If two consecutive tests fail to meet the specified limit, a test shall be performed at least every 24 months until two consecutive tests meet the specified limit, at which time the test schedule may be resumed.
- f. By conducting a leakage test on the drywell-to-suppression chamber vacuum breakers at a differential pressure of at least 4.0 psi and verifying that the total leakage area A/\sqrt{k} contributed by all vacuum breakers is less than or equal to 24% of the specified limit and the leakage area for an individual set of vacuum breakers is less than or equal to 12% of the specified limit. The vacuum breaker leakage test shall be conducted during each refueling outage for which the drywell-to-suppression chamber bypass leak test in Specification 4.6.2.1.e is not conducted.

* The CHANNEL CALIBRATION for level transmitters LT-55-2N062B, -2N062F shall be performed at least once per 18 months.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20545-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 108 AND 71 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated June 20, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TSs). These amendments revise TS Surveillance Requirements (SR) 4.6.1.2.a, 4.6.1.2.b, and 4.6.1.2.e, to reference 10 CFR Part 50, Appendix J (hereafter referred to as Appendix J) for the 1) Type A (Integrated Leakage Rate Test), and 2) Drywell-to-Suppression Chamber (bypass) leakage tests instead of providing explicit testing schedules and other requirements in the TSs (this latter test is not a Type A test but has been required by the TSs to be done during the same period as LGS's Type A test).

2.0 EVALUATION

TS SR 4.6.1.2.a currently requires a set of three Type A (Overall Integrated Containment Leakage Rate) tests be performed at 40 ± 10 month intervals during each 10-year service period, with the third test of each set performed during the shutdown for the 10-year plant inservice inspection. Section III.D.1.(a) of Appendix J requires that Type A tests of the containment be scheduled as a set of three tests, to be performed at approximately equal intervals, during each 10-year service period, with the third set to coincide with the shutdown for the 10-year plant inservice inspection.

TS SR 4.6.1.2.b currently requires a Commission approved test schedule for subsequent tests if the Type A test fails to meet $0.75 L_a$. It also requires testing every 18 months until two consecutive tests meet $0.75 L_a$ if two consecutive Type A tests fail to meet L_a . These requirements are also delineated in Section III.A of Appendix J.

TS SR 4.6.1.2.e currently requires Drywell-to-suppression chamber bypass leak tests to be conducted at 40 ± 10 month intervals to coincide with the containment integrated leakage rate tests. As in the above cases, the licensee is requesting to delete the explicit testing schedule and instead state that the tests will coincide with the Type A test (which will be done in accordance with the Appendix J schedule).

Current TS SRs 4.6.1.2.a and b duplicate the requirements delineated in Appendix J. Since the proposed changes reference the controlling regulations instead of paraphrasing the regulations, and because the staff finds there is no safety requirement to perform the surveillances more frequently than required by the regulations, the NRC staff finds the proposed changes to be acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 42605). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: S. Dembek

Date: January 25, 1996